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7  
8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF NEVADA**

10  
11 SHONTELLE BAKER,

12 Plaintiff,

13 v.

14  
15 C. R. BARD, INCORPORATED and BARD  
PERIPHERAL VASCULAR,  
16 INCORPORATED,

17 Defendants.  
18

CASE NO. 2:19-cv-01862-JCM-BNW

**STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO  
MOTION TO DISMISS FOR LACK  
OF PERSONAL JURISDICTION  
(FIRST REQUEST)**

19 Now come the parties in the above-captioned matter pursuant to Local Rule IA 6-1 and  
20 hereby submit this Stipulation for Extension of Time to Respond to Motion to Dismiss for  
21 Lack of Personal Jurisdiction. Specifically, the parties request an additional one week to  
22 allow them to meet-and-confer on this matter to determine what action to take, if any, or seek  
23 transfer to the appropriate jurisdiction. As grounds therefore, the parties state as follows:

24 The parties believe that they may reach agreement as to the underlying facts pertaining  
25 to jurisdiction and the proper action, if any, to direct this matter to the proper jurisdiction.  
26 Given the timing of the motion prior to the Thanksgiving holiday, the parties have not had the  
27 time to meet-and-confer nor has counsel for Plaintiff had an opportunity verify the residence  
28 of their client at the time of implant ten years ago and the reasoning from any Nevada third-

party to recommend the product implanted in Plaintiff. The parties believe that one week is sufficient time to verify such needed information and to allow the parties to meet-and-confer once such information is reviewed.

For the foregoing reasons, the parties stipulate and request that this Court enter an order allowing an additional one week, to and including **December 11, 2019**, for Plaintiff to respond to the Motion to Dismiss for lack of personal jurisdiction.

**IT IS SO STIPULATED.**

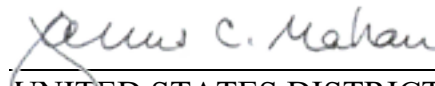
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**IT IS SO ORDERED.**

  
 UNITED STATES DISTRICT COURT  
 JUDGE

Dated December 5, 2019.

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